

REMARKS

Claims 1-3, 5-9, 11, 12, 14, 16-20 and 33-50 are pending in this application. Claims 1-3, 5-9, 11, 12, 14, 16-20 and 33-50 stand rejected. Applicant reserves the right to pursue the original claims and other claims in this application and in other applications.

Claims 1-3, 6-9, 11, 12, 14, 16-20 and 33-50 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Juso (U.S. Patent No. 6,265,783) in combination with Forray (U.S. Pub. No. 2002/0062923). The rejection is respectfully traversed and reconsideration is respectfully requested.

Submitted concurrently herewith is a "Declaration of Tongbi Jiang Under 37 CFR 1.131" (hereinafter the "Jiang Declaration"); Tongbi Jiang is the sole inventor of the claimed invention. The Jiang Declaration establishes a "prior invention" with respect to the effective date of the Juso reference (i.e., December 13, 1999). That is, the Jiang Declaration establishes conception of the claimed invention prior to the effective date of the Juso reference (i.e., December 13, 1999) coupled with due diligence from prior to the reference date to the filing date of the present application (i.e., January 18, 2000).

Although the Office Action's rejections are based on 35 U.S.C. §103(a), the reference cited by the Office Action is used as a §102(e) reference. Applicant respectfully submits that Juso is not a proper §102(e) reference, and cannot be used against the present application for the reasons set forth above. *See* M.P.E.P. § 715.07. "A rejection based on 35 U.S.C. 102(e) can be overcome by . . . [f]iling an affidavit or declaration under 37 CFR 1.131 showing prior invention." M.P.E.P. § 706.02(b).

The relevant portion of 37 CFR 1.131 states: "(a) When any claim of an application or a patent under reexamination is rejected, the inventor of the subject matter of the rejected claim . . . may submit an appropriate oath or declaration to establish invention of the subject matter of the rejected claim prior to the effective date of the reference or activity on which the rejection is based." *Id.* (emphasis added). The Jiang Declaration properly establishes invention

of the subject matter of the rejected claims prior to the effective date of the reference cited. Accordingly, Juso cannot be used as prior art under any provision of §102.

In addition, Forray does not disclose, teach, or suggest the claimed invention. Indeed, the Office Action cites Forray merely to allege that the reference “utilizes an adhesive with a glassy temperature between 20 to 50 degrees Celsius.” Office Action at 3. Forray fails to disclose, teach, or suggest a semiconductor device assembly comprising “a solder mask over a substrate; a die; conductive paths connecting contacts on said die with contacts in said substrate; and a layer comprising at least one partially-cured adhesive adhering said die to said solder mask, said partially-cured adhesive comprising one or more adhesive components that can cure at a temperature above ambient and at or below 100°C,” as recited by independent claim 1.

Forray also fails to disclose, teach, or suggest, suggest a semiconductor device assembly comprising “a solder mask over a substrate; a die; electrical contacts on said substrate and said die, each said contact on said die being connected to a respective said contact on said substrate, said electrical contacts being devoid of contamination caused by outgassing from said solder mask; and a layer comprising a partially-cured adhesive affixing said die to said solder mask, said partially-cured adhesive containing one or more adhesive components that have curing temperatures above ambient and at or below 100°C,” as recited by independent claim 12.

Accordingly, Applicant respectfully submits that claims 1-3, 6-9, 11, 12, 14, 16-20 and 33-50 are allowable over the combination of Juso and Forray.

For at least the reasons set forth above, the rejection of claims 1-3, 6-9, 11, 12, 14, 16-20 and 33-50 should be withdrawn and all of the claims allowed.

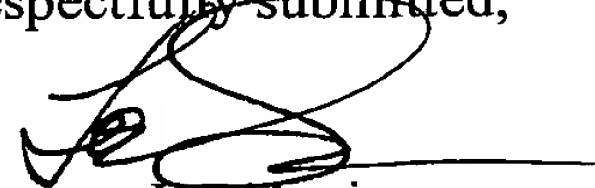
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In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue.

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Respectfully submitted,



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